

EXHIBIT B

From: [Joseph J. Zito](#)
To: [Lamkin, Rachael](#)
Cc: [ksheets@aipisolutions.com](#); [William Ramey](#); [Erik Lund](#); [Litigation Attorneys](#); [LitigationParalegals](#); [Edlin, Elise \(SFO\)](#); [Dreyer, Lauren](#); [Gonzales, Natalie](#); [Piepmeier, Sarah \(SFO\)](#); [House, Ariel](#)
Subject: Re: Compliance with the Court's PI
Date: Friday, November 3, 2023 2:28:35 PM

Yes, that is correct, for Prior Defendants who owe no future payments to Valjakka.

Joseph J. Zito
WHITESTONE LAW
Suite 550
1850 Towers Crescent Plaza
Tysons, Virginia 22182
jzito@whitestone.law
202-466-3500

On 11/3/2023 11:01 AM, Lamkin, Rachael wrote:

Joe,

Thank you for your reply. To be clear, are you saying that the PI Order does not need to be sent to the defendants who have settled with Valjakka under your interpretation of the Court's Order?

Rachael
Rachael D. Lamkin
916.747.6091

On Nov 3, 2023, at 9:52 AM, Joseph J. Zito <jzito@whitestone.law> wrote:

[EXTERNAL EMAIL]

Rachael:

I received a copy of the Sealed PI Order DE#204 yesterday. I understand that the date for redaction was November 25 (i.e. one week from October 18, as per DE#205) Thus the date for "transmission" is November 6.

To be clear, in addition to CDN and IPRA, who have already received copies, the document needs to be sent to any licensee that owes money to Valjakka, to ensure that the money is not transferred out to a third party and to ensure that no money or other assets is "sold, used, moved, concealed, transferred or otherwise disposed of" by Valjakka when it becomes "in his possession, custody or control."

We will make appropriate transmissions on Monday.

You also have my assurances that any future "Enforcement Assets"

will be received directly into a Whitestone IOLTA account and held until such time as the PI is lifted and only be disbursed pursuant to a Court ruling. We will provide you with any accounting related to the IOLTA.

Joseph J. Zito
WHITESTONE LAW
Suite 550
1850 Towers Crescent Plaza
Tysons, Virginia 22182
jzito@whitestone.law
202-466-3500

On 11/3/2023 7:33 AM, Lamkin, Rachael wrote:

Bill, Joe, Ken,

Please provide by noon PST today proof you complied with the Court's Order to serve a copy of his Order on all licensees. In your continued silence, we will assume non-compliance.

Rachael

From: Lamkin, Rachael

Sent: Thursday, November 2, 2023 11:36 AM

To: ksheets@aipisolutions.com; Joseph J. Zito

jzito@whitestone.law; William Ramey

wramey@rameyfirm.com; Erik Lund

elund@whitestone.law

Cc: Litigation Attorneys litattorneys@rameyfirm.com;

LitigationParalegals LitParalegals@rameyfirm.com; Edlin,

Elise (SFO) EEEdlin@perkinscoie.com; Dreyer, Lauren

Lauren.Dreyer@BakerBotts.com; Gonzales, Natalie Alfaro

natalie.gonzales@bakerbotts.com; Piepmeier, Sarah (SFO)

SPiepmeier@perkinscoie.com; House, Ariel

ariel.house@bakerbotts.com

Subject: RE: Compliance with the Court's PI

Ken, Bill, Joe,

As you know, the Court ordered Mr. Valjakka to provide a copy of the Court's PI Order to all licensees within ten days of that order, i.e., by 10/28/23. Dkt. No. 202, at 13. Please demonstrate your compliance with said Order.

Rachael

From: Lamkin, Rachael
Sent: Monday, October 30, 2023 2:22 PM
To: ksheets@aipisolutions.com; Joseph J. Zito
<jzito@whitestone.law>; William Ramey
<wramey@rameyfirm.com>; Erik Lund
<elund@whitestone.law>
Cc: Litigation Attorneys <litattorneys@rameyfirm.com>;
LitigationParalegals <LitParalegals@rameyfirm.com>; Edlin,
Elise (SFO) <EEdlin@perkinscoie.com>; Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>; Gonzales, Natalie Alfaro
<natalie.gonzales@bakerbotts.com>; Piepmeier, Sarah (SFO)
<SPiepmeier@perkinscoie.com>
Subject: RE: Compliance with the Court's PI

Ken, Bill, Joe,

Please respond to my request, sent one week ago. Absent a response, we will assume there is no confidential information in Mr. Valjakka's CUVTA discovery responses. To the extent you disagree, please identify the exact information you believe is confidential and the legal basis for that belief.

Rachael

From: Lamkin, Rachael
Sent: Tuesday, October 24, 2023 5:34 AM
To: ksheets@aipisolutions.com; Joseph J. Zito
<jzito@whitestone.law>; William Ramey
<wramey@rameyfirm.com>; Erik Lund
<elund@whitestone.law>
Cc: Litigation Attorneys <litattorneys@rameyfirm.com>;
LitigationParalegals <LitParalegals@rameyfirm.com>; Edlin,
Elise (SFO) <EEdlin@perkinscoie.com>; Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>; Gonzales, Natalie Alfaro
<natalie.gonzales@bakerbotts.com>; Piepmeier, Sarah (SFO)
<SPiepmeier@perkinscoie.com>
Subject: Re: Compliance with the Court's PI

Ken, Bill, Joe,

Good morning. Please identify the information in this response you think is confidential and the reason for said confidentiality. I don't believe any of the information therein was or remains confidential.

Rachael
Rachael D. Lamkin
916.747.6091

On Oct 19, 2023, at 2:37 PM, Lamkin, Rachael
<rachael.lamkin@bakerbotts.com> wrote:

Ken,

Thanks for sending. We'll accept it.

Rachael

From: Ksheets@aipisolutions.com
<ksheets@aipisolutions.com>
Sent: Thursday, October 19, 2023 1:38 PM
To: Lamkin, Rachael
<rachael.lamkin@bakerbotts.com>; Joseph J.
Zito <jzito@whitestone.law>; William Ramey
<wramey@rameyfirm.com>; 'Erik Lund'
<elund@whitestone.law>
Cc: Litigation Attorneys
<litattorneys@rameyfirm.com>;
LitigationParalegals
<LitParalegals@rameyfirm.com>; Edlin, Elise
(SFO) <EEdlin@perkinscoie.com>; Dreyer,
Lauren <Lauren.Dreyer@BakerBotts.com>;
Gonzales, Natalie Alfaro
<natalie.gonzales@bakerbotts.com>;
Piepmeier, Sarah (SFO)
<SPiepmeier@perkinscoie.com>
Subject: RE: Compliance with the Court's PI

[EXTERNAL EMAIL]

Rachel,

I attached an updated certified discovery
response from Mr. Valjakka with the statement
"I certify (or declare) under penalty of perjury
under the laws of the State of California that
the foregoing is true and correct." Does this
suffice?

Regards,
Ken

From: Lamkin, Rachael
<rachael.lamkin@bakerbotts.com>
Sent: Friday, October 13, 2023 7:26 PM
To: Joseph J. Zito <jzito@whitestone.law>;
William Ramey <wramey@rameyfirm.com>;
'Erik Lund' <elund@whitestone.law>
Cc: Litigation Attorneys
<litattorneys@rameyfirm.com>;
LitigationParalegals
<LitParalegals@rameyfirm.com>;
Ksheets@aipisolutions.com; Edlin, Elise (SFO)
<EEEdlin@perkinscoie.com>; Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>; Gonzales,
Natalie Alfaro
<natalie.gonzales@bakerbotts.com>;
Piepmeier, Sarah (SFO)
<SPiepmeier@perkinscoie.com>
Subject: RE: Compliance with the Court's PI

Joe,

The interrogatories are not actually verified.
All verifications must state the date and
location of their signing and state that they are
being signed under penalty of perjury. And,
because Mr. Valjakka is in Finland, his
verification must state, "I certify (or declare)
under penalty of perjury under the laws of the
State of California that the foregoing is true
and correct".

See Cal Civ Proc 2015.5

[Cal. Civ. Proc. Code § 2015.5 \(Deering,
Lexis Advance through the 2023 Extra
Session Ch 1, 2023 Regular Session Ch.
261\)](#)

See also

[Mabvax Therapeutics Holdings v. Honing
E-File, 2021 Cal. Super. LEXIS 53672, *2](#)

Stone Brewing Co., LLC v. Molson Coors Brewing Co., No. 18cv331-BEN-LL, 2019 U.S. Dist. LEXIS 58616, at *15 (S.D. Cal. Apr. 4, 2019)

Please send a proper verification.

Rachael

From: Joseph J. Zito <jzito@whitestone.law>
Sent: Friday, October 13, 2023 3:38 PM
To: Lamkin, Rachael
<rachael.lamkin@bakerbotts.com>; William Ramey <wramey@rameyfirm.com>; 'Erik Lund' <elund@whitestone.law>
Cc: Litigation Attorneys <litattorneys@rameyfirm.com>; LitigationParalegals <LitParalegals@rameyfirm.com>; Edlin, Elise (SFO) <EEdlin@perkinscoie.com>; Dreyer, Lauren <Lauren.Dreyer@BakerBotts.com>; Gonzales, Natalie Alfaro <natalie.gonzales@bakerbotts.com>; Piepmeier, Sarah (SFO) <SPiepmeier@perkinscoie.com>
Subject: Re: Compliance with the Court's PI

[EXTERNAL EMAIL]

Onni is available Next week. We will provide specific dates on Monday.

Joseph J. Zito
WHITESTONE LAW
jzito@whitestone.law
202-466-3500
On 10/13/2023 6:26 PM, Lamkin, Rachael wrote:

Thanks Joe,

Nothing was attached. Can you resend?

Also please proposed dates for Onni's deposition.

Finally, when will you and Ken be making appearances?

Rachael

From: Joseph J. Zito
[<jzito@whitestone.law>](mailto:jzito@whitestone.law)
Sent: Friday, October 13, 2023
3:22 PM
To: Lamkin, Rachael
[<rachael.lamkin@bakerbotts.com>](mailto:rachael.lamkin@bakerbotts.com);
William Ramey
[<wramey@rameyfirm.com>](mailto:wramey@rameyfirm.com); 'Erik
Lund' [<elund@whitestone.law>](mailto:elund@whitestone.law)
Cc: Litigation Attorneys
[<litattorneys@rameyfirm.com>](mailto:litattorneys@rameyfirm.com);
LitigationParalegals
[<LitParalegals@rameyfirm.com>](mailto:LitParalegals@rameyfirm.com);
Edlin, Elise (SFO)
[<EEEdlin@perkinscoie.com>](mailto:EEEdlin@perkinscoie.com);
Dreyer, Lauren
[<Lauren.Dreyer@BakerBotts.com>](mailto:Lauren.Dreyer@BakerBotts.com);
Gonzales, Natalie Alfaro
[<natalie.gonzales@bakerbotts.com>](mailto:natalie.gonzales@bakerbotts.com);
Piepmeier, Sarah (SFO)
[<SPiepmeier@perkinscoie.com>](mailto:SPiepmeier@perkinscoie.com)
Subject: Re: Compliance with the
Court's PI

[EXTERNAL EMAIL]

Rachael:

Lauri was mistaken, CDN was not dissolved, see amended / verified Discovery responses.

Joseph J. Zito
WHITESTONE LAW
jzito@whitestone.law
202-466-3500

On 10/13/2023 6:11 PM, Lamkin,
Rachael wrote:

Thanks Ken,

Still missing is the
dissolution
paperwork for CDN
Licensing. Can you
also send that
paperwork please?

Rachael

From:

Ksheets@aipisolutions.com
<ksheets@aipisolutions.com>

Sent: Friday,
October 13, 2023
3:01 PM

To: Lamkin, Rachael
<rachael.lamkin@bakerbotts.com>;

William Ramey
<wramey@rameyfirm.com>;

Joseph J Zito
<jzito@whitestone.law>;
emorehouse@whitestone.law;

'Erik Lund'
<elund@whitestone.law>

Cc: Litigation
Attorneys
<litattorneys@rameyfirm.com>;

LitigationParalegals
<LitParalegals@rameyfirm.com>;

Edlin, Elise (SFO)
<EEEdlin@perkinscoie.com>;

Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>;

Gonzales, Natalie
Alfaro
<natalie.gonzales@bakerbotts.com>;

Piepmeier, Sarah
(SFO)
<SPiepmeier@perkinscoie.com>

Subject: RE:
Compliance with the
Court's PI

[EXTERNAL EMAIL]

Rachael,

I have attached documents in response to your request. Three documents relate to formation of CDN Licensing. Two documents are a) ordering the PI transcript and b) sending the transcript to Mr. Valjakka.

Regards,
Ken

From: Lamkin, Rachael
<rachael.lamkin@bakerbotts.com>
Sent: Friday, October 13, 2023 1:31 PM
To: William Ramey
<wramey@rameyfirm.com>;
emorehouse@aipisolutions.com;
elund@aipisolutions.com;
Joseph J Zito
<jzito@whitestone.law>;
Ksheets@aipisolutions.com
Cc: Litigation Attorneys
<litattorneys@rameyfirm.com>;
LitigationParalegals
<LitParalegals@rameyfirm.com>;
Edlin, Elise (SFO)
<EEEdlin@perkinscoie.com>;
Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>;
Gonzales, Natalie Alfaro
<natalie.gonzales@bakerbotts.com>;
Piepmeier, Sarah

(SFO)

<SPiepmeier@perkinscoie.com>

Subject: Compliance
with the Court's PI

Joe, Bill, Ken,

Please provide these
items today:

1. The email Mr. Valjakka testified to in his deposition yesterday: the email wherein Bill Ramey sent Mr. Valjakka a link to the transcript of the Court's PI hearing;
2. the exact date that Mr. Ramey called Mr. Valjakka to explain the Court's PI Order; and
3. proof that Bill Ramey or anyone on this team has purchased or has otherwise accessed the transcript of the Court's PI hearing, with proof of the date of said purchase or

access.

We are deciding
today whether we
need to move the
Court for a remedy
based on the failure
to advise Mr.
Valjakka as to the
scope of the Court's
PI Order.

Thank you for your
prompt attention to
this critical issue.

Rachael

From: William

Ramey

<wramey@rameyfirm.com>

Sent: Tuesday,

October 3, 2023 2:12

AM

To: Lamkin, Rachael

<rachael.lamkin@bakerbotts.com>;

AiPi, Solutions LLC

(Work)

<emorehouse@aipisolutions.com>;

AiPi, Solutions LLC

(Work)

<elund@aipisolutions.com>;

Joseph J Zito

<jzito@whitestone.law>;

ken sheets (Work)

<ksheets@aipisolutions.com>

Cc: Litigation

Attorneys

<litattorneys@rameyfirm.com>;

LitigationParalegals

<LitParalegals@rameyfirm.com>;

Edlin, Elise (SFO)

<EEdlin@perkinscoie.com>;

Dreyer, Lauren

<Lauren.Dreyer@BakerBotts.com>;

Piepmeier, Sarah

(SFO)

<SPiepmeier@perkinscoie.com>

Subject: RE: CUVTA

Discovery

Importance: High

[EXTERNAL EMAIL]

Hi Rachael,

We are extremely busy on the MSJ responses but do not want seem unresponsive. I have copied my co-counsel who has worked on this matter with us from the start. They can help you with this.

Copied here are Eric Morehouse, Joe Zito, Erik Lund and Ken Sheets. We have been informed that at least Joe will be making an appearance.

Thanks,

Bill

William P. Ramey, III

<image001.png>
5020 Montrose Bvd.,
Suite 800
Houston, Texas
77006
(713) 426-3923
(832) 900-4941
(facsimile)

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is unauthorized.

From: Lamkin,
Rachael
<rachael.lamkin@bakerbotts.com>

Sent: Monday,
October 2, 2023 3:42
PM

To: William Ramey
<wramey@rameyfirm.com>

Cc: Litigation
Attorneys
<litattorneys@rameyfirm.com>;
LitigationParalegals
<LitParalegals@rameyfirm.com>;
Edlin, Elise (SFO)
<EEdlin@perkinscoie.com>;
Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>;
Piepmeier, Sarah
(SFO)
<SPiepmeier@perkinscoie.com>

Subject: RE: CUVTA
Discovery

Hi Bill,

Following up on
below. Let me know

if you think a phone call would be easier. We need to discuss dates of production and email production, dates of privilege log production, and depo dates after same.

Rachael

From: William Ramey
<wramey@rameyfirm.com>
Sent: Thursday, September 28, 2023 12:36 PM
To: Lamkin, Rachael
<rachael.lamkin@bakerbotts.com>
Cc: Litigation Attorneys
<litattorneys@rameyfirm.com>; LitigationParalegals
<LitParalegals@rameyfirm.com>; Edlin, Elise (SFO)
<EEdlin@perkinscoie.com>; Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>; Piepmeier, Sarah (SFO)
<SPiepmeier@perkinscoie.com>
Subject: RE: CUVTA Discovery

[EXTERNAL EMAIL]

Hi Rachael,

Let me talk with the client. It will likely be Monday before I can get back to you.

Bill

From: Lamkin,
Rachael
<rachael.lamkin@bakerbotts.com>
Sent: Thursday,
September 28, 2023
2:14 PM
To: William Ramey
<wramey@rameyfirm.com>
Cc: Litigation
Attorneys
<litattorneys@rameyfirm.com>;
LitigationParalegals
<LitParalegals@rameyfirm.com>;
Edlin, Elise (SFO)
<EEdlin@perkinscoie.com>;
Dreyer, Lauren
<Lauren.Dreyer@BakerBotts.com>;
Piepmeier, Sarah
(SFO)
<SPiepmeier@perkinscoie.com>
Subject: CUVTA
Discovery

Hi Bill,

In light of the Court
Order adopting our
requested CUVTA
discovery and
ordering depositions
in October, I want to
make sure Netflix
will get a full
document
production,
including emails,
before depositions.
If you do not think a
full production can
be done in time for
October depositions,
we need to discuss a
stipulated
modification to the

Court's Order.

Regarding emails,
the model order calls
for 5 custodians and
terms. We have only
sought one RFP so
let us know if you
still want specific
custodians and
terms identified. We
can get those to you
today if that is your
preference.

Rachael

Rachael D. Lamkin

Partner

Baker Botts L.L.P.

Rachael.Lamkin@BakerBotts.com

T +1.415.291.6264

M +1.916.747.6091

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[<image002.jpg>](#)

[<image002.jpg>](#)

**Confidentiality
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